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May 5, 2015

By Fax And E-File

Hon. Frank Maas
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 740
New York, New York 10007

Re: *In re Terrorist Attacks on September 11, 2001*
03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

We represent defendant Yassin Abdullah Kadi in this matter. We write to inform the Court that all issues but one raised in our letter-motion to compel dated February 12, 2015, have been resolved as the result of discussions with plaintiffs' counsel. The one open issue relates to our interrogatories 1 through 7, to the limited extent that they sought the identities of persons with knowledge relevant to plaintiffs' claims in this action.

In our letter-motion, we argued that these interrogatories were permissible under Local Civil Rule 33.3. In a telephone conversation with plaintiffs' counsel, we initially agreed that they would identify persons with knowledge of their claims in the context of the revision of their initial disclosures that they had been discussing with the Defendants' Executive Committee ("DEC"). In a follow-up email the next day, I clarified that our interrogatories call for more information than the witness lists that were being negotiated with the DEC, since our interrogatories sought the identities of persons with relevant information regardless of whether they were witnesses plaintiffs intended to use in this lawsuit. I made clear that to that extent, we expected a response, and asked at least for a date by which we might receive one. We have not received such a date.

Hon. Frank Maas

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May 5, 2015

We understand that issues related to the scheduling of further discovery will be discussed at the May 13 conference, and request that this issue be one of them.

Respectfully,

A handwritten signature in black ink, reading "Peter C. Salerno". The signature is written in a cursive, flowing style.

Peter C. Salerno

cc: All counsel (by email and e-file)